

*✍* Ferriter Scobbo & Rodophele PC *✍*

ATTORNEYS AT LAW

125 High Street, Boston, Massachusetts 02110  
Tel: (617) 737-1800 Fax: (617) 737-1803

Robert M. Granger  
(617) 737-1800 Ext. 238  
E-MAIL: [rgranger@ferriterscobbo.com](mailto:rgranger@ferriterscobbo.com)

April 26, 2004

**VIA E-MAIL and HAND-DELIVERY**

David S. Rosenzweig, Esq.  
Keegan, Werlin & Pabian, LLP  
265 Franklin Street, Sixth Floor  
Boston, MA 02110

RE: NSTAR Electric, D.T.E. 03-121

Dear Mr. Rosenzweig:

Enclosed please find The Energy Consortium's third set of information requests in the above-captioned matter. Responses should be filed on or before May 3, 2004. If you have any questions, please contact me.

Sincerely,

Robert M. Granger

RMG:nbc  
Enclosures

cc: Mary Cottrell (by hand)  
William Stevens (by hand)  
John Cope-Flanagan (by hand)  
Sean Hanley (by hand)  
Claude Francisco (by hand)  
Xuan Yu (by hand)  
Robert Harrold (by hand)  
Jeff Hall (by hand)  
Joseph Passaggio (by hand)  
Meera Bhalotra (by hand)  
Service List (by mail)

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**THIRD SET OF INFORMATION REQUESTS OF  
THE ENERGY CONSORTIUM TO NSTAR ELECTRIC, D.T.E. 03-121**

Pursuant to 220 C.M.R. 1.06(6)(c), The Energy Consortium hereby submits to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company the following information requests with respect to the above captioned matter.

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by The Energy Consortium to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company in this proceeding.

1. "NSTAR Electric" or "Companies" means Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company, their officers, directors, employees, consultants, and attorneys.
2. "Company" means each of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company and their respective officers, directors, employees, consultants and attorneys. Where a request is directed to "the Company" or "each of the Companies" provide a separate response for each Company.
3. "Department" means the Department of Telecommunications and Energy.
4. "Proposed Rates" means the rates proposed by the Companies in this proceeding: Boston Edison Company, Rates SB-1 and SB-2; Cambridge Electric Light Company, Rates SB-1, MS-1, SS-1, SB-2 and SB-3; and Commonwealth Electric Company, Rates SB-1 and SB-2.
5. "Applicable Rate Schedule" means the Applicable Rate Schedule referred to in each of the Proposed Rates.
6. "Distributed Generation" or "DG" has the meaning ascribed to it in G.L. c. 164, §1.
7. "Last General Rate Case" means, for each Applicable Rate Schedule, the last Department proceeding in which the Company submitted a cost of service study in support of the Applicable Rate Schedule.
8. "Companies' Filing" or "Filing" means all the documents NSTAR Electric filed in this proceeding.
9. Each request should be answered in writing on a separate page with a recitation of the

request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.

10. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
11. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
12. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
13. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
14. If the Company finds that any of these requests is ambiguous, please notify The Energy Consortium counsel so that the requests can be clarified prior to the preparation of a written response.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**THIRD SET OF INFORMATION REQUESTS OF  
THE ENERGY CONSORTIUM TO NSTAR ELECTRIC, D.T.E. 03-121**

Pursuant to 220 C.M.R. § 1.06(6)(c), The Energy Consortium ("TEC") hereby submit to NSTAR Electric the following information requests.

**Questions for Mr. LaMontagne:**

- TEC 3-1. Referring to Mr. LaMontagne's Rebuttal Testimony at p. 12, line 7, please define "non-coincident peak basis." Does non-coincident peak refer to the customer's contribution to class peak, or the individual customer's maximum annual demand?
- TEC 3-2. Referring to Mr. LaMontagne's Rebuttal Testimony at p. 12, lines 17 and 18, provide the basis for Mr. LaMontagne's assertion that DG customers will forgo generation in order to profit from selling gas in the market. Identify any specific DG customers known to Mr. LaMontagne within the NSTAR service territory who have forgone generation in order to sell natural gas in the market.
- TEC 3-3. Referring to Mr. LaMontagne's Rebuttal Testimony at p. 15, line 11, provide the basis for the statement that "most customers will install DG to satisfy base load requirements."
- TEC 3-4. Please provide a copy of all load studies Mr. LaMontagne has performed or reviewed comparing the load characteristics of DG customers with the load characteristics of non-DG customers.
- TEC 3-5. For the 15 customers (excluding MIT) with generation identified in the supplemental response to TEC 2-1, please provide the monthly billing demands and the ratio of average to maximum as shown in Exhibit NSTAR-HCL-8.
- TEC 3-6. Referring to Mr. LaMontagne's Rebuttal Testimony at p. 24, line 11, define "a standby service customer's non-coincident peak distribution requirements." State whether "non-coincident peak" refers to the customer's individual maximum demand or the customer's contribution to class peak demand.
- TEC 3-7. Referring to Mr. LaMontagne's Rebuttal Testimony at p. 27, lines 11 and 12, describe "enforceable, technical ability."
- TEC 3-8. Referring to Mr. LaMontagne's Rebuttal Testimony at p. 29, lines 9 and 10,

provide the basis for the proposal to include “a 20% threshold for the applicability of standby service.”

- TEC 3-9. Has Mr. LaMontagne ever used maximum customer demand as an allocator for distribution plant in an embedded cost of service study for one of the NSTAR companies? Assume maximum customer demand is the sum of the individual customer peaks in the class in the test year. If Mr. LaMontagne has ever used such an allocator, identify the company, the date of the study, and the specific three-digit account numbers (accounts 360 to 373) to which he applied the allocator. Provide a copy of the study.

**Questions for Mr. Salamone:**

- TEC 3-10. Referring to Mr. Salamone’s Rebuttal Testimony at p. 4, line 10, define “non-coincident peak demands of all customers on the circuit.”
- TEC 3-11. Referring to Mr. Salamone’s Rebuttal Testimony at p. 5, lines 5-7, please provide supporting documentation for the statement that “diversity factor values range from 95% to 100%.” Also, provide a definition of “diversity factor.”
- TEC 3-12. In planning for a distribution circuit, does Mr. Salamone consider load growth and reserve margins? If so, please state the range of the specific assumptions Mr. Salamone has used in planning studies.
- TEC 3-13. In planning for a distribution substation, does Mr. Salamone consider load growth and reserve margins? If so, please state the range of the specific assumptions Mr. Salamone has used in planning studies.
- TEC 3-14. On page 7 of Mr. Salamone’s Rebuttal Testimony, Mr. Salamone states, “For DG units of 1 MW or more, loads normally supplied by customer generation are also added to these values based on the potential unavailability of that generation during peak load conditions.” In its supplemental response to TEC 2-1, NSTAR identified only two customers other than MIT with generation over 1 MW. (Commonwealth G-3 customer with 1,050 kW, and BECO T-2 customer with 1,800 kW.) Please identify the circuit serving these customers, the total capacity of each circuit, and the maximum monthly loads in 2003 on the circuits (including the date and time of peak). Please supply historical circuit planning studies and documentation showing the explicit assumptions for these two customers.
- TEC 3-15. On p. 14, lines 1-2 of his Rebuttal Testimony, Mr. Salamone states that the DG installations of 1 MW or more are specifically tracked and added to the coincident peak load of the substation. Please identify the two substations serving the two customers identified in Information Request TEC 3-14, the capacity of each substation, and the monthly peak load on the substation in 2003 (including day

and time of the peak). Please provide historical substation planning documents showing explicit inclusion of the two customers noted in Information Request TEC 3-14.

- TEC 3-16. Referring to Mr. Salamone's Rebuttal Testimony at p. 10, line 14, please describe in detail all instances to Mr. Salamone's personal knowledge when a DG customer in the NSTAR system has sold "fuel at a large profit."
- TEC 3-17. Referring to Mr. Salamone's Rebuttal Testimony at p. 6, lines 18-19, please define non-coincident peak for a substation.
- TEC 3-18. Please provide a copy of NSTAR's most recent econometric-based load forecast for non-residential customers.
- TEC 3-19. Please provide an estimate of the costs per kW per foot (or comparable unit) of distribution circuit configurations for secondary service for (a) overhead construction; (b) radial underground construction; and (c) network underground construction. Please conclude all assumptions and inputs.
- TEC 3-20. Referring to Mr. Salamone's Rebuttal Testimony at p. 7, lines 5-7, please provide documentation for the diversity factors for substations in the 92% to 98% range.
- TEC 3-21. On page 3, lines 3-4, of his Rebuttal Testimony, Mr. Salamone states that "investments made on behalf of standby customers are fixed and unavoidable." Does Mr. Salamone think that distribution investment on behalf of a non-DG customer with identical load characteristics is also fixed and avoidable? If no, please explain.
- TEC 3-22. Please provide copies of all load studies Mr. Salamone has reviewed or conducted comparing the load characteristics of DG customers with non-DG customers.
- TEC 3-23. For each of the NSTAR companies, please supply a list of the distribution substations, their location, the maximum capacity for each (summer and winter ratings, if applicable), and maximum summer and winter load on each. Please provide this information on an Excel spreadsheet.

**Questions for Ms. Parmesano:**

- TEC 3-24. Referring to Ms. Parmesano's Rebuttal Testimony at page 6, lines 17-20, please explain how the current structure of rates for customers without generation does not provide signals to DG customers of the costs of providing standby service both in terms of (a) maintaining the necessary infrastructure; and (b) delivering the energy when the customer's generation is not producing at the normal level.

- TEC 3-25. Referring to Exhibit NSTAR-HSP-2 at p. 5, please provide all supporting data for the statement: “Customers with DG may have load characteristics that are very different from those of customers that purchase all of their electricity requirements.”
- TEC 3-26. Please provide all data examined or utilized by Ms. Parmesano regarding the load characteristics of existing customers with generation in NSTAR’s service territory.
- TEC 3-27. Please provide all testimony and supporting exhibits by Ms. Parmesano regarding electric standby rates from January 1, 1999 to the present. Please also supply transcripts of cross-examination and copies of regulatory decisions relating to this testimony.
- TEC 3-28. Please provide all testimony and supporting exhibits by Ms. Parmesano regarding ratchets in electric rates from January 1, 1999 to the present. Please also supply transcripts of cross-examination and copies of regulatory decisions regarding this testimony.
- TEC 3-29. Referring to Ms. Parmesano’s Rebuttal Testimony at p. 11, lines 6-9, please provide a copy of the Department approved cost studies that are the basis of the current unbundled distribution rates of the three NSTAR utilities. Please show how these cost studies were unbundled into components.
- TEC 3-30. Has Ms. Parmesano advocated using maximum customer demand as an allocator for distribution plant in an embedded costs of service study for a client? Assume maximum customer demand is the sum of the individual customer peaks in the class in the test year. If so, list the utility, the date of the study, and the specific three-digit account numbers (accounts 360 to 373) for which the allocator was proposed. Provide a copy of any study using such recommended allocator.
- TEC 3-31. Please provide a copy of “Alternative Approaches to Area-Specific Marginal Transmission and Distribution Cost Estimation” (1994 EPRI presentation).
- TEC 3-32. Please provide a copy of “Standby Rates for Cogenerators and Small Power Producers” (November 15, 1985).
- TEC 3-33. Please provide a copy of “Line Extension Policies in the Restructured U.S. Electric Industry” (April 2001).
- TEC 3-34. Please provide a copy of “Line Extension Policies - Due for a Change?” (April 3-4, 2002).

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**CERTIFICATE OF SERVICE**

DTE 03-121

I hereby certify that I have this day served the foregoing Third Set of Information Requests of the The Energy Consortium upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Practice and Procedure.)

Dated at Boston this 26<sup>th</sup> day of April, 2004.

\_\_\_\_\_  
Robert M. Granger



## SERVICE LIST

### NSTAR ELECTRIC DTE 03-121

Mary Cottrell, Secretary  
Department of Telecommunications & Energy  
One South Station, 2<sup>nd</sup> Fl.  
Boston, MA 02210

William Stevens, Hearing Officer  
Department of Telecommunications & Energy  
One South Station, 2<sup>nd</sup> Fl.  
Boston, MA 02210

John Cope-Flanagan, Legal Division  
Department of Telecommunications & Energy  
One South Station, 2<sup>nd</sup> Fl.  
Boston, MA 02210

Sean Hanley  
Rates and Revenue Requirements Division  
Department of Telecommunications & Energy  
One South Station, 2<sup>nd</sup> Fl.  
Boston, MA 02210

Claude Francisco  
Rates and Revenue Requirements Division  
Department of Telecommunications & Energy  
One South Station, 2<sup>nd</sup> Fl.  
Boston, MA 02210

Xuan Yu  
Rates and Revenue Requirements Division  
Department of Telecommunications & Energy  
One South Station, 2<sup>nd</sup> Fl.  
Boston, MA 02210

Robert Harrold  
Electric Power Division  
Department of Telecommunications & Energy  
One South Station, 2<sup>nd</sup> Fl.  
Boston, MA 02210

Jeff Hall  
Rates and Revenue Requirements Division  
Department of Telecommunications & Energy  
One South Station, 2<sup>nd</sup> Fl.  
Boston, MA 02210

Joseph Passaggio  
Rates and Revenue Requirements Division  
Department of Telecommunications & Energy  
One South Station, 2<sup>nd</sup> Fl.  
Boston, MA 02210

Meera Bhalotra  
Rates and Revenue Requirements Division  
Department of Telecommunications & Energy  
One South Station, 2<sup>nd</sup> Fl.  
Boston, MA 02210

David S. Rosenzweig, Esq.  
Keegan, Werlin & Pabian, LLP  
265 Franklin Street  
Boston, MA 02110-3113  
[drosen@kwplaw.com](mailto:drosen@kwplaw.com)  
617-951-1400  
617-951-1354

Robert M. Granger, Esq.  
Roger Freeman, Esq.  
Ferriter Scobbo & Rodophele, PC  
125 High Street, 26<sup>th</sup> Floor  
Boston, MA 02110  
[rgranger@ferriterscobbo.com](mailto:rgranger@ferriterscobbo.com)  
[rfreeman@ferriterscobbo.com](mailto:rfreeman@ferriterscobbo.com)  
617-737-1800  
617-373-1803

Robert Werlin, Esq.  
Keegan, Werlin & Pabian, LLP  
265 Franklin Street, 6<sup>th</sup> Fl.  
Boston, MA 02110  
[rwerlin@kwplaw.com](mailto:rwerlin@kwplaw.com)  
617-951-1400  
617-951-1354

Susan Richter, Manager  
Power Generation Systems  
Wyeth BioPharma  
One Burt Road  
Andover, MA 01810

Gerry Bingham  
Division of Energy Resources  
70 Franklin Street, 7<sup>th</sup> Floor  
Boston, MA 02110  
[Gerry.bingham@state.me.us](mailto:Gerry.bingham@state.me.us)  
617-727-4732  
617-727-0030

Alvaro Pereira  
Division of Energy Resources  
70 Franklin Street, 7<sup>th</sup> Floor  
Boston, MA 02110  
[Alvaro.Pereira@state.ma.us](mailto:Alvaro.Pereira@state.ma.us)  
617-727-4732  
617-727-0030

Richard Mills, Esq.  
7 Tanager Street  
Arlington, MA 02476  
781-646-4635

Michael D. Vhay, Esq.  
Piper Rudnick  
One International Place, 21<sup>st</sup> Floor  
Boston, MA 02110-2600  
[Michael.vhay@piperrudnick.com](mailto:Michael.vhay@piperrudnick.com)  
617-406-6033

Ronald J. Schott  
Wyeth Pharmaceuticals, Inc.  
5 Giralda Farms  
Madison, NJ 07940  
973-660-6641

Heather Hunt  
w.h. Robert & h.f. Hunt, LLC  
242 Whippoorwill Lane  
Stratford, CT 06614  
[heather@wrobert.net](mailto:heather@wrobert.net)  
203-380-1477

Pentti J. Aalto  
PJA Energy Systems Design  
720 Bachelder Road  
Pembroke, NH 03275  
[pjaesd@comcast.net](mailto:pjaesd@comcast.net)  
603-485-2559  
603-485-8046

*Note: On Distribution List Only – Not a Party  
or Participant*

Joseph W. Rogers, Esq.  
Colleen McConnell  
Office of the Attorney General  
200 Portland St., 4<sup>th</sup> Fl.  
Boston, MA 02114-1715  
[joseph.rogers@ago.state.ma.us](mailto:joseph.rogers@ago.state.ma.us)  
[colleen.mcconnell@ago.state.ma.us](mailto:colleen.mcconnell@ago.state.ma.us)  
617-727-2200  
617-727-1047

Stephen Klionsky, Esq.  
Western Massachusetts Electric Company  
100 Summer Street  
Boston, MA 02110-2131  
[klionsk@nu.com](mailto:klionsk@nu.com)  
617-345-1066

Bruce Barnett, Esq.  
Piper Rudnick  
One International Place, 21<sup>st</sup> Floor  
Boston, MA 02110-2600  
[Bruce.Barnett@piperrudnick.com](mailto:Bruce.Barnett@piperrudnick.com)  
617-406-6002  
617-406-6100

Paul W. Gromer  
Peregrine Energy Group  
151 Merrimac Street, Suite 660  
Boston, MA 02114  
[pgromer@peregrinegroup.com](mailto:pgromer@peregrinegroup.com)  
617-367-0777  
617-367-6299

Andrew J. Newman, Esq.  
Rubin & Rudman, LLP  
50 Rows Wharf  
Boston, MA 02110  
[anewman@rubinrudman.com](mailto:anewman@rubinrudman.com)  
617-330-7031  
617-439-9556

Robert Ruddock, General Counsel  
Angela M. O'Connor  
Vice-President Energy Programs  
Associated Industries of Massachusetts  
222 Berkley Street, (13<sup>th</sup> Fl.)  
Boston, MA 02117-0763  
[rrr@aimnet.org](mailto:rrr@aimnet.org)  
[aoconnor@aimnet.org](mailto:aoconnor@aimnet.org)  
617-262-1180  
617-536-6785

Donald Bishop, Manager  
Regulatory Planning and Policy  
Western Massachusetts Electric Company  
100 Summer Street  
Boston, MA 02110-2131  
[bishodm@nu.com](mailto:bishodm@nu.com)  
617-748-5141  
617-748-5151

Seth Kaplan  
Conservation Law Foundation  
62 Summer Street  
Boston, MA 02110  
[skaplan@clf.org](mailto:skaplan@clf.org)  
617-350-0990  
617-350-4030

Diane A. Langley, Deputy General Counsel  
Division of Energy Resources  
70 Franklin Street, 7<sup>th</sup> Fl.  
Boston, MA 02110  
[Diane.Langley@state.ma.us](mailto:Diane.Langley@state.ma.us)  
617-727-4732  
617-727-0030

Amy G. Rabinowitz, Counsel  
National Grid  
(Massachusetts Electric Company)  
25 Research Drive  
Westborough, MA 01582  
[Amy.rabinowitz@us.ngrid.com](mailto:Amy.rabinowitz@us.ngrid.com)  
508-389-2975  
508-389-2463

Adam P. Kahn  
Anne Sterman  
Foley Hoag, LLP  
155 Seaport Blvd.  
Boston, MA 02210  
617-832-1206  
617-832-7000

Robert Borghesani, Chairman  
The Energy Consortium  
24 Hastings Road  
Lexington, MA 02421-6807  
[rogborg@rcn.com](mailto:rogborg@rcn.com)  
781-862-0888

James J. O'Connor, Assistant Counsel  
UTC Power, LLC  
195 Governor's Highway  
South Windsor, CT 06074

Rudy Stegemoeller, Esq.  
Plug Power, Inc.  
P.O. Box 359  
Poestenkill, NY 12140  
[rudysteg@capital.net](mailto:rudysteg@capital.net)  
518-283-0933  
518-283-0933

Gary Epler, Senior Regulatory Counsel  
Unitil Service Corp.  
6 Liberty Lane West  
Hampton, NH 03842  
[epler@unitil.com](mailto:epler@unitil.com)  
603-773-6440

Jerrold Oppenheim, Esq.  
57 Middle Street  
Gloucester, MA 01930  
[jerroldopp@democracyandregulation.com](mailto:jerroldopp@democracyandregulation.com)  
978-283-0897  
978-283-0957

Edward A. Davis  
Manager, Pricing Strategy  
Northeast Utilities Service Company  
107 Selden Street  
Berlin, CT 06037

Patricia Crowe, Counsel  
KeySpan Energy Delivery New England  
52 Second Avenue  
Waltham, MA 02451  
[pcrowe@keyspanenergy.com](mailto:pcrowe@keyspanenergy.com)  
781-466-5131  
781-290-4965

Francis Cummings  
Massachusetts Renewable Energy Trust  
75 North Drive  
Westborough, MA 01581-3340  
[cummings@masstech.org](mailto:cummings@masstech.org)  
508-870-0312  
508-898-9226

*Q:\rmf\Standby Rates\3rd set info requests (Energy Consortium).rtf*